REMARKS

Applicants thank the Examiner for conducting a telephone interview with the

undersigned on June 13, 2006. A Statement of Substance of Interview is enclosed herewith.

After the Interview, the Examiner maintained that he believes that the claimed features

are satisfied by the Bluetooth reference. The Examiner mentioned that it may be helpful if

Applicants could identify the exemplary portions of the figures that correspond to the claimed

features so that he can better understanding the claimed invention. Accordingly, below,

Applicants identify exemplary portions of the figures that correspond to the claimed features, as

set forth below, and Applicants maintain the same arguments as set forth previously, since the

Examiner only responds by pointing out general teachings of the Bluetooth reference.

Claims 1-14 are all the claims pending in the present application. Claims 1-14 under 35

U.S.C. § 102(a) as allegedly being anticipated by Bluetooth (specification of the Bluetooth

System, vol. 1.0a, July 26, 1999).

In an effort to identify exemplary portions of the figures that correspond to the claimed

features of claim 1, for example, Applicants identify the operations of Fig. 2 in bold below.

Claim 1:

An authentication method for establishing a connection between devices that can

wirelessly communicate data, the method comprising the steps of:

(a) sending a first authentication-request message to another device to perform an

authentication procedure with the other device to which a connection is wanted **(S202 OF FIG.**

2);

2

(b) sending a predetermined message according to a current operation mode to the other device and storing the predetermined message **(S228 OF FIG. 2)** when an authentication-response message **(S204 OF FIG. 2)** to the first authentication-request message is received;

(c) after performing the step (b), checking whether a received first message is a response message corresponding to the predetermined message when the first message from the other device is received **(S232 OF FIG. 2)**;

(d) sending a response message corresponding to a second authentication-request message to the other device when the result of checking in the step (c) indicates that the first message is the second authentication-request message **(S236 OF FIG. 2)**;

(e) after performing the step (d), checking whether a second message is a response message corresponding to the predetermined message when the second message from the other device is received **(S239 OF FIG. 2)**; and

(f) finishing the authentication procedure when the result of checking in the step (e) indicates that the second message is a response message corresponding to the predetermined message **(S240 OF FIG. 2)**.

As indicated previously, Applicants submit that the Examiner still has not demonstrated that each and every one of the claim limitations are satisfied by the Bluetooth reference, and that the Examiner has simply provided a description of the general teaching of the Bluetooth reference without identifying the specific messages that correspond to the claimed messages set forth in the .

Also, Applicants maintain the following arguments, which were previously presented.

With respect to independent claims 1 and 7, even if, *arguendo*, the Examiner has identified specific messages in the Bluetooth reference which allegedly correspond to the claimed messages[1], the specific operations (c) and (d) of claim 1, for example, are not satisfied. Applicants maintain that even if one substitutes the messages of the Bluetooth that allegedly correspond to the claimed first authentication request message, predetermined message, and authentication response message, respectively, as recited in claim 1, the specific recitations set forth in claim 1 are still clearly not satisfied by Bluetooth. The Examiner is apparently utilizing impermissible hindsight reasoning, as the Examiner appears to be picking and choosing different portions of the applied reference to satisfy the specific features set forth in claim 1. By stepping through the recitations of claim 1, for example, it is evident that the Bluetooth reference does not satisfy the particular features set forth in claim 1.

With respect to dependent claims 2-6, 8-11, 13, and 14, Applicants submit that these claims are patentable at least by virtue of their indirect or direct dependency from independent claim 1.

With respect to independent claim 7, Applicants maintain the previous arguments and submit that this claim is patentable at least based on reasons similar to those set forth above with respect to claim 1.

---

[1] The Examiner alleges that: 1) the LMP_unit_key (or LMP_comb_key) message corresponds to the claimed "predetermined message", 2) the LMP_in_rand (or LMP_au_rand) message corresponds to the claimed "first authentication-request message", and 3) the LMP_accepted (or LMP_not_accepted) message corresponds to the claimed "authentication response message"

Similarly, with respect to independent claim 12, Applicants maintain our previous arguments and traverse this rejection at least based on reasons similar to those set forth above.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.
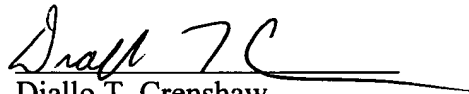
Respectfully submitted,

SUGHRUE MION, PLLC
Telephone: (202) 293-7060   Diallo T. Crenshaw
Facsimile: (202) 293-7860   Registration No. 52,778

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: August 8, 2006